

July 12, 2019

The Honorable Jesse M. Furman
Thurgood Marshall U.S. Courthouse
United States District Court for the Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

RE: Joint letter requesting extensions of time in *State of New York, et al. v. U.S. Dep't of Commerce, et al.*, 18-CV-2921 (JMF).

Dear Judge Furman,

On behalf of all parties, Plaintiffs write pursuant to this Court's Rule 1.A and Rule 1.E to request that the Court extend by four days the current briefing deadlines in this action. The parties believe these extensions will allow time for the parties to meet and confer regarding appropriate next steps in these proceedings, including whether the parties can agree on entry of a stipulated order that may resolve open matters.

Defendants are currently due to oppose by today, July 12, 2019, Plaintiffs' motion to amend the judgment pursuant to Rule 59(e) or for injunctive relief pursuant to the All Writs Act. Docket Nos. 616, 617, 628. The parties propose to extend this deadline to July 16, 2019. This is the first request for an extension of this deadline. No party opposes this extension.

Plaintiffs are currently due to file by today, July 12, 2019, their motion for sanctions or other relief, including any request for discovery. Docket No. 605. The parties propose to extend this deadline to July 16, 2019. This is the first request for an extension of this deadline. No party opposes this extension.

The parties recognize that this Court's Rule 1.E presumptively provides that requests for an extension of time be made at least 48 hours prior to the deadline. In this instance, these requests are occasioned by the issuance of an Executive Order by the President, and related announcements by the President and the U.S. Attorney General, yesterday evening. Docket No. 627. In light of these developments, the parties have begun conferring on appropriate next steps in these proceedings, and believe the short extensions of time requested in this letter will facilitate those continuing discussions.

On behalf of all parties with permission,

Respectfully submitted,

LETITIA JAMES
Attorney General of the State of New York

By: /s/ Matthew Colangelo
Matthew Colangelo, *Chief Counsel for Federal Initiatives*
Elena Goldstein, *Acting Bureau Chief, Civil Rights Bureau*

Office of the New York State Attorney General
28 Liberty Street
New York, NY 10005
Phone: (212) 416-6057
matthew.colangelo@ag.ny.gov

Attorneys for the *State of New York* Plaintiffs